1 2 3 4 5	RENE L. VALLADARES Federal Public Defender State Bar No. 11479 NISHA BROOKS-WHITTINGTON Assistant Federal Public Defender 411 E. Bonneville Avenue, Suite 250 Las Vegas, Nevada 89101 (702) 388-6577/Phone (702) 388-6261/Fax		
6	Attorneys for Kory Allen Crossman		
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	* * *		
11	UNITED STATES OF AMERICA,	2:07-cr-145-KJD-PAL-9	
12	Plaintiff,	STIPULATION TO EXTEND	
13	VS.	DEADLINES IN THIS COURT'S APRIL 8, 2015 ORDER BY	
14	KORY ALLEN CROSSMAN,	SIXTY (60) DAYS	
15	Defendant.		
16			
17	The United States of America, by Assistant United States Attorney Elizabeth Olson White		
18	and Defendant Kory Allen Crossman, by Assistant Federal Public Defender Nisha		
19	Brooks-Whittington, submit the following Joint Stipulation to extend, by sixty (60) days, all of the		
20	deadlines set in this Court's Order dated April 8, 2015. See CR 1475.		
21	The parties agree and stipulate to the following:		
22	1. On November 26, 2008, this Court sentenced Defendant to 140 months' imprisonment		
23	on his conviction for drug-related offenses. CR 437.		
24	2. On March 23, 2015, undersigned	counsel filed a motion for appointment of counsel	
25	pursuant to 18 U.S.C. § 3006A and Local Rule 44-1 on behalf of Mr. Crossman to determine		
26	whether he may qualify to seek a reduction of his sentence in light of Guidelines Amendment 782		
27	and 18 U.S.C. § 3582(c)(2). CR 1474.		
28			

1	3. On April 8, 2015, this Court iss	sued an Order appointing the Federal Public Defender	
2	to represent Defendant, and setting deadlines. Specifically, the Court ordered the Probation Office		
3	to provide certain documents to the parties within 30 days (i.e., by May 8, 2015) and ordered the		
4	Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by		
5	August 6, 2015). CR 1475.		
6	4. The parties requested Mr. Cross	sman's disciplinary hearing and progress report records	
7	from the Bureau of Prisons and to date they have not been received. Additional time is requested		
8	to receive and review those records prior to filing any motions with the Court.		
9	5. For the reason stated above, the	ne parties respectfully request that the Court issue an	
10	order extending the deadlines in the Court's April 8, 2015 Order, by sixty (60) days.		
11	DATED this 6 th day of August, 2015.		
12	Respectfully submitted,		
13			
14	RENE L. VALLADARES Federal Public Defender	DANIEL G. BOGDEN United States Attorney	
15	/s/ Nisha Brooks-Whittington	/s/ Elizabeth O. White	
16	NISHA BROOKS-WHITTINGTON,	ELIZABETH O. WHITE,	
17	Assistant Federal Public Defender	Appellate Chief and Assistant United States Attorney	
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19			
20	IT IS SO ORDERED.		
21			
22	KENT J. DAWSON, U.S. District Judge		
23	August 17, 2015		
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25			
26			
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